

**\*ORDER\***

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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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**DEVI RAJSHRI SETHUMADHAVA MENON**

Docket No. 2:21-cv-08384

Plaintiff,

- against -

**CERTIFICATION OF AVRAM E.  
FRISCH IN RESPONSE TO THE  
CALL FOR DISMISSAL**

**WARD CORBETT AND CATALYST  
PARTNERS MANAGEMENT LLC**

Defendant.

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Pursuant to 28 U.S.C. § 1746, I, Avram E. Frisch, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the attorney for the Plaintiff in this action and make this declaration in response to the Court's call for dismissal filed on December 22, 2022.
2. As the Court is aware, Defendant Ward Corbett has been evading service. Numerous efforts to serve Mr. Corbett have been undertaken, but the Court has not been satisfied that the papers have in fact reached Mr. Corbett or that Plaintiff's proposed alternative service were sufficient to ensure due process.

3. The history is recited (and incorporated by reference) in Judge Clark's opinion and order at ECF #11, which suggested that the Plaintiff subpoena Facebook to ensure that service on Mr. Corbett could be completed.
4. Initially, after Judge Clark's order, the Plaintiff decided to subpoena a local organization, the New York Urban League, of which Mr. Corbett claims to be an officer for information about his address. A true copy of this subpoena is annexed hereto as **Exhibit A**.
5. Unfortunately, the New York Urban League appears to have no physical offices and after a couple of months of effort and numerous attempts, the subpoena went unserved. Annexed hereto as **Exhibit B** are true copies of the various affidavits from my process server seeking to serve the New York Urban League.
6. Upon receiving the Court's call for dismissal, I recognized my oversight in failing to serve Facebook when the NY Urban League subpoena went unanswered and promptly served that subpoena. A true copy of that subpoena is annexed hereto as **Exhibit C**.
7. The subpoena is pending but no response has yet been received.
8. Plaintiff has been working hard to serve a defendant who is simply aiming to avoid service, and therefore requests the Court's indulgence in allowing another 90 days to complete the subpoena and to file another motion for alternative service in accordance with Judge Clark's directives. X
9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 8, 2023.

**SO ORDERED**

***s/James B. Clark***

**James B. Clark, U.S.M.J.**

**Date:** 1/10/23

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/s/ Avram E. Frisch  
Avram E. Frisch